NO FURTHER ACTION DETERMINATION

CFA-33 CFA FUEL OIL TANK AT CFA 667 (SOUTH SIDE)
OPERABLE UNIT 4-03

WAG 4

DECISION DOCUMENTATION PACKAGE COVER SHEET

PREPARED IN ACCORDANCE WITH

TRACK 1 SITES: GUIDANCE FOR ASSESSING LOW PROBABILITY SITES AT INEL

SITE DESCRIPTION: Underground Storage Tank CFA-667S

SITE ID: CFA-33

OPERABLE UNIT: 04-03

WASTE AREA GROUP: 04

1. SUMMARY - PHYSICAL DESCRIPTION OF THE SITE:

CFA-33 Is the historical site of a 4,000 gal underground storage tank designated as CFA-667S. The tank was installed in 1951 within 5 ft at the southwest corner of building CFA-667. The tank was used to store fuel oil used for heating the building. The tank was abandoned in 1986. In May 1989, the remaning contents of the tank were sampled for waste profile analysis and determined to be fuel oil #2. The remaining 20 gal of fuel were collected in October 1990 by EG&G Idaho Hazardous Waste for recycling. Less than 0.5 in. were left in the bottom of the tank.

The tank was removed in October 1990 under the direction of the EG&G Idaho Tank Management Program. Volatile organic compounds (VOCs) were monitored during removal per program guidelines. All readings were well below the EG&G Idaho field action level for diesel of 50 ppm. Some soil contamination was observed around the fill port during removal and was removed, collected, and transported to the Central Facilities Area landfill for landfarming. Upon removal of the tank, areas for soil sampling were selected based on where contamination was most likely to occur. The field VOC readings for these live soil samples were well below the EG&G action level for diesel. Based on these readings, the excavation was determined acceptable for backfilling and was done with original noncontaminated soil and with soil from the gravel pit at the INEL CFA. Laboratory analyses of the soil samples confirmed field readings. Analyses for total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and xylene were performed by DataChem Laboratories of Salt Lake City, UT with no contamination detected in any of the samples.

DECISION RECOMMENDATION II. SUMMARY - QUALITATIVE ASSESSMENT OF RISK:

The information gathered has been determined reliable and the qualitative risk assessment concluded low. Tank removal and sample analyses were conducted following published procedures and no confliction information was found in any records documenting the processes. Using the Qualitative Risk and Reliability Evaluation Table, it is concluded that no further action is required for CFA-33.

III. SUMMARY - CONSEQUENCES OF ERROR:

If the decision is made in error to close CFA-33, the possibility exists for contaminant migration to groundwater. The contaminants include benzene, toluene, ethylbenzene, xylene, and petroleum hydrocarbons in the form of #2 diesel fuel. If, in actuality, the tank did leak its capacity of 4,000 gal to the surrounding soil, an estimated 350 yd3 of soil would be contaminated.

If the decision is made in error to further remediate CFA-33 and the site poses no actual environmental threat, realized benefits would be minimal relative to the high investment in remediation expenditures.

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None.

RECOMMENDED ACTION:

It is recommended that COCA Site CFA-33 be reclassified as to "no-action" status and removed from the list of INEL solid waste management units. The information gathered is deemed reliable and the assessed risk is very low. The tank was removed following established procedures and biased soil samples were collected for analysis of TPH and BTEX. No contamination was detected in any of the soil samples. These results suggest that no contamination is present at the site and that it poses no environmental threat. Further remediation of this COCA site would require funding which could be utilized more efficiently in other areas.

SIGNATURES	# PAGES:	DATE: 12/10/91
Prepared By: J. Bensu-	00	E WAG Manager:
Approved By:	Indi	ependent Review: Liannon Withis

NO FURTHER ACTION DETERMINATION

State of Idaho have comp waste site, as it pertains to review, the Parties have	Energy, the U.S. Environmental leted a review of the referenced infilthe INEL Federal Facility Agreemed determined that no further action subject to review at the time of its for no further action:	ormation for <u>CFA 3</u> int of <u>12/u/97</u> for purposes of investig	hazardous _ Based on this ation or study is
References:			
DOE Project Manager		16_	1/16/72 Date
EPA Project Manager	May Tex	1	1/16/9/2 Date
Idaho Project Manager/	PANY		1/10/2

Date

	STATEMENT
(BY DC	DE RPM)
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DECISION STATEMENT				
	(BY EPA RPM)			
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DECISION STATEMENT	
(BY STATE RPM)	
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- source does not pose a right based on	
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by the State.	
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	/)
DATE: # PAGES (DECISION STATEMENT)	
NAME: Dear J. Nyses / SIGNATURES for 1/ 1/200	

col 1 Processes Associated with this site	col 2 Waste Description & Handling Procedures	col 3 Description & Location of any Artifact/Structures/Disposal Areas Associated with this Waste or Process
Process Diesel fuel oil #2 storage in an underground storage tank (UST) CFA-667S	20 gal. of diesel fuel oil #2 recovered by EG&G Idaho, Inc. Hazardous Waste Program	Artifact Location Description
		Artifact Location Description
		Artifact Location Description
Process Removal of UST CFA-667S	Diesel fuel oil #2 contaminated soil	Artifact Underground storage tank Location Now removed, previously located within 5 ft southwest of CFA-667 Description 4,000 gal. steel tank
		Artifact Associated piping Location Now removed, previously located with tank southwest of CFA-667 Description Tar-coated steel piping
		Artifact Location Description
Process		Artifact Location Description
		Artifact Location Description
		Artifact Location Description

DECISION STATEMENT (BY STATE RPM)
(DI STATE NEW)
DATE RECD: 1/16/92
DISPOSITION:
CFA 33 UST 6675
Survey Hossessment residual soil sampling
action. Questro concerning reference #9
should have addressed ovantity sufficient
should have addressed quantity sufficient to not be alaumed at fiture release potential
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GPR reference not GPR results but interpret of GPR data. Paristatic pump of lack contents of holding time may have caused volititization
Ref #8 should be 18th for date.
Recommend No Prather outro
DATE: 1/16/92 # PAGES (DECISION STATEMENT)
NAME: Wayne Piegge SIGNATURE: Nayn Pierr

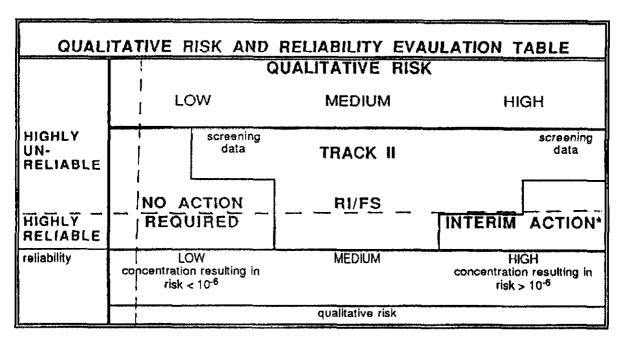
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		Description		

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PROCESS (col 1) UST Removal	Y	VASTE	Soil		
col 4 What known/potential hazardous substances/constituents are associated with this waste or process?	Col 5 Potential sources associated with this hazardous material?	Col 6 Known/estimate d concentrations of hazardous substances/ constituents ^a	Col 7 Risk based concentration mg/kg	Col 8 Qualitative risk assessment (Hi/Med/Lo)	Col 9 Overall reliability (Hi/Med/Lo)
Benzene	Contaminated Soil	ND, DL = 0.05		Low	High
oluene	Contaminated Soil	ND, DL = 0.05		Low	High
thylbenzene	Contaminated Soil	ND, DL = 0.05		Low	High
(ylene	Contaminated Soil	ND, DL = 0.1		Low	High
PH	Contaminated Soil	ND, DL =0.01b		Low	High
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<sup>a. ND = not detected
DL = detection limit in ppm
b. Units = mg/g</sup>



^{*} if there exist sufficient data to identify an appropriate remedy

Question 1. What are the waste generation process locations and dates of operation associated with this site?						
Block 1 Answer:						
COCA Site CFA-33 is the location of a removed underground storage tank designated CFA-667S. The capacity of the tank was initially believed to be 6,000 gal, but upon removal, the dimensions of the tank were used to calculate an actual capacity of 4,000 gal. The steel tank was installed in 1951 at the southwest corner of building CFA-667 and used for storing fuel oil for heating the building. A map of the tank location is attached. The tank was operational until 1986, when it was abandoned. Records indicate that the tank had no internal protection and that the outside of the tank was painted for external protection. The associated piping was constructed of tar-coated steel. The area around the buried tank was enclosed by a fence, and consequently, a secondary access to the fill pipe was run from the tank to outside the fence, approximately 12 ft from the tank. A vent pipe was also present with this tank, located approximately 5 ft from the tank next to CFA-667. A ground penetrating radar (GPR) survey was employed by the Tank Management Program which provided this information; a diagram of the GPR results is attached.						
n La Haw rallable in	ara tha informatia	n courso/o2 V High N	And low (see			
one)	are the informatio	n source/s? <u>X</u> High _N	VIEULOW (check			
	SONING BEHI	ND THIS EVALUATI	ON.			
	The information was obtained from personnel involved directly in the processes associated with operation of the tank, content sampling, and tank removal.					
Block 3 Has this INFOR IF SO, DESCRIBE			(check one)			
The location, size, and logi	stics of the tank were	verified upon removal in Oc	tober 1990.			
Block 4 Sources of Information : (check appropriate box(es) and write in source)						
No available information	[]	Analytical data	[X] <u>4</u>			
Anecdotal	[X] 8	Documentation about data	()			
Historical process data	[]	Disposal data	[1			
Current process data	[]	Q.A. data	[]			
Areal photographs		Safety analysis report				
Engineering/site drawings		D&D report	(1			
Unusual Occurrence Report		Initial assessment				
Summary documents	[X] 10	Well data	[]			
Facility SOPs	[]	Construction data	[]			
OTHER	[X] 6, 12	-				

Question 2. What are the disposal process locations and dates of operation associated with this site? How was the waste disposed?

Block 1 Answer:

In May 1989, the tank contents were sampled by EG&G Idaho Environmental Science and Technology (ES&T) personnel for waste profile analysis. The sample was sent to EG&G Idaho Environmental Chemistry for laboratory analysis and determined to be #2 diesel fuel. The level of liquid in the tank was measured by ES&T personnel and found to be approximately 1.5 in. In October 1990, prior to removal of the tank, 20 gal of liquid were pumped from the tank by EG&G Idaho Hazardous Waste Programs for recycling. Less than 0.5 in. of liquid was left in the tank.

Removal of the tank occurred on October 24, 1990 under the guidance of EG&G Idaho Tank Management Program removal procedures. Volatile organic compound (VOC) readings were taken by ES&T personnel using a Photovac Microtip photionization detector (PID) throughout the removal process. All readings were found to be well below the EG&G Idaho field action levels for diesel of 50 ppm. According to sampling records, a small diesel-contaminated region of soil was observed near the fill port but was removed and transported to the INEL landfill for landfarming. Five soil samples were collected from the excavation by ES&T personnel for laboratory analysis. Samples were taken specifically from areas where contamination from the tank contents was most likely to occur. The soil sampling areas are shown on the attached diagram. Samples were collected by scooping the tank excavation with a heavy equipment bucket and sampling directly from this removed soil. The scoop samples were taken from a uniform depth of 7 ft. The samples were screened with the PID for preliminary VOC readings and found to be well below the EG&G field action levels for diesel. Based on the condition of the tank and the field VOC readings, the excavation was deemed acceptable for backfilling and was done with noncontaminated soil from the excavation and with soil from the gravel pit at the INEL CFA.

Laboratory analyses of the soil sampled were performed by DataChem Laboratories of Salt Lake City, UT for total petroleum hydrocarbons (TPH) and for benzene, toluene, ethylbenzene, and xylene (collectively known as BTEX). No contamination was found in any of the samples. Laboratory detection limits were given as 0.05 ug/g for benzene, toluene, and ethylbenzene; 0.1 ug/g for xylene; and 0.01 mg/g for TPH.

The tank was cut into smaller pieces and shipped to Pacific Steel of Idaho Falls for disposal. Four pieces of piping were included in the shipment.

Block 2 How reliable is/are the information source/s? X High Med Low (check one)

EXPLAIN THE REASONING BEHIND THIS EVALUATION.

The information was obtained from sampling logbooks and removal records documenting the sampling and removal process.

Question 2. What are the disposal process locations and dates of operation associated with this site? How was the waste disposed? (Continued)						
Block 3 Has this INFORMATION been confirmed? XYes No (check one) IF SO, DESCRIBE THE CONFIRMATION. Several sources were used to obtain this information.						
Block 4 Sources of Information: (check appropriate box(es) and write in source)						
No available information	[]		Analytical data	[X] <u>3</u>		
Anecdotal	[]	9	Documentation about data	[]		
Historical process data	[]		Disposal data	[X] 7,11		
Current process data	[]		Q.A. data	[]		
Areal photographs	[X]	5	Safety analysis report	[]		
Engineering/site drawings	[]		D&D report	[]		
Unusual Occurrence Report	[]		Initial assessment	[]		
Summary documents	[X]	10	Well data	[]		
Facility SOPs	[]		Construction data	[]		
OTHER	[X]	2				

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Block 1 Answer	*			
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Block 2 How reli	able is/are t	he information	source/s? X High _	Med Low (check
one)				 .
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The information wa	as obtained dir	ectly from record	s documenting the remova	al process.
Block 3 Has this IF SO, DESC			firmed? X Yes No ATION.	(check one)
		nt with data obtain	ned from the analytical labo	oratory,
substantiating this	information.			
Block 4 Source	s of Inform	ation: (chec	k appropriate box(es)	and write in
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Historical process d	ata {}		Disposal data	[]
Current process date	BL []		Q.A. data	[]
Areal photographs	IJ,		Safety analysis report	()
Engineering/site dra	wings []		D&D report	[]
Unusual Occurrence	Report []		Initial assessment	[]
Summary document	s [X]	10	Well data	[]
Facility SOPs	[]		Construction data	
OTHER	[X]	2		

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What an es	Question 6. Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.						
Block 1 Answer:							
Block 1 Answer: Based on analytical data, no contaminated region exists. However, using the dimensions of 14 It long, 6 It wide/deep obtained by the GPR survey, and the known capacity of the tank, 4,000 gal, a hypothetical contaminated region could be estimated. Using a model developed by EG&G Idaho, Inc., a region of 350 yd3 of soil is estimated. The model and calculations are attached.							
(check one) EXPLAIN THE R The information was ob	EASONING B	nation source/s? X High EHIND THIS EVALUAT documenting the field sampling	ION.				
established analytical la	poratory,						
Block 3 Has this INFO		n confirmed? <u>X</u> Yes <u>No</u> IRMATION.	(check one)				
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Block 4 Sources of Information: (check appropriate box(es) and write in source)							
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Historical process data		Disposal data	[]				
Current process data		Q.A. data	11				
•	[]	Safety analysis report	11				
Areal photographs Engineering/site drawings		Safety analysis report D&D report					
Areal photographs Engineering/site drawings	[]	<u> </u>					
Areal photographs	[]	D&D report					
Areal photographs Engineering/site drawings Unusual Occurrence Repo	[] ort []	D&D report Initial assessment					

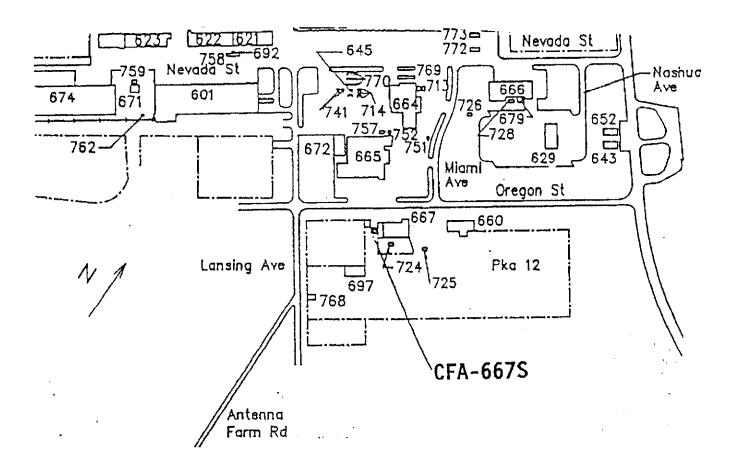
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Block 1 Answer:			İ			
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	e is/are the informat	ion source/s? X High _I	MedLow (check			
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The information was of from an established an		cumenting the removal proces	s and from results			
Block 3 Has this INF	OBMATION been c	onfirmed? X Yes No	(check one)			
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Field require of the ooil	associate with r	southe from the application labor	aton			
rield results of the son	Samples collicide with n	esults from the analytical labor	alory.			
	f Information: (ch	eck appropriate box(es)	and write in			
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No available Information	(1	Analytical data	[X] <u>3</u>			
Anecdotal		Documentation about data	()			
Historical process data	[]	Disposal data	[]			
Current process data	[]	Q.A. data				
Areal photographs	[]	Safety analysis report	[]			
Engineering/site drawing	s []	D&D report	[]			
Unusual Occurrence Rep	oort []	Initial assessment	[]			
Summary documents	[]	Well data	[]			
Facility SOPs	[]	Construction data	[]			
OTHER [X] 2						
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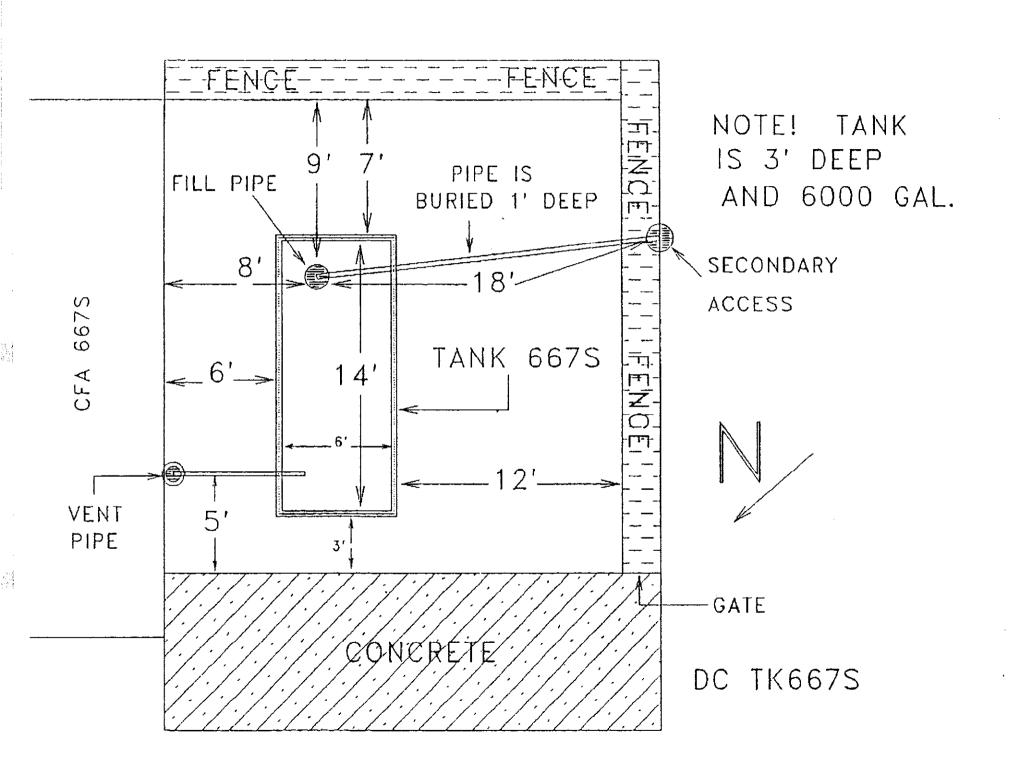
ŗ			nazardous substance/ exists today? If so, de			
Block 1 Answe	r:	100				
No evidence exists indicating a source exists at this site. The tank was removed, soil samples taken from the excavation were determined noncontaminated, and the excavation was backfilled to grade with noncontaminated soil.						
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	liable is/are t	he information	source/s? <u>X</u> High _	Med _Low (check		
one) EXPLAIN TH	E REASO	NING BEHIN	D THIS EVALUAT	ION.		
	s based on reco		the removal process and re			
Block 3 Has this IF SO, DESC			firmed? <u>X</u> Yes _No ATION.	(check one)		
Field sampling res	sults coincide w	ith laboratory and	alytical results.			
Block 4 Sources of Information: (check appropriate box(es) and write in source)						
No available inform			Analytical data	[X] <u>3</u>		
Anecdotal Historical process of	[] data []		Documentation about data Disposal data			
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Areal photographs	[] [1]		Safety analysis report	1)		
Engineering/site dra	awings []	-	D&D report	[]		
Unusual Occurrenc			Initial assessment	11		
Summary documen			Well data	[]		
Facility SOPs	ii.		Construction data	i 		
OTHER		2				

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SAMPLE LOGBOOK
MAP OF SAMPLING LOCATION: (include location of sampling points and reference points) (FA6675 Furlai (6000 59/16/15)
LDEESON ST.
5#) CF667
F. Wast
RECORDED BY: Visco DANIEL QA CHECK BY: LM Luce

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ESTIMATION OF VOLUME OF CONTAMINATED SOIL FROM A FUEL OIL SPILL

A. S. ROOO

AUGUST 7, 1991

PROBLEM: What is the volume of contaminated soil which would result from a surface fuel oil spill of a known or estimated quantity?

: SMOIT9MUZZA

- N GALLON FUEL SPILL
- SOIL POROSITY = 0.35 (p) (Case et al., pg A-62)
- THE RESIDUAL SATURATION CAPACITY (RS) = { 0.10, 0.15, 0.20 }

The residual saturation for fuel oils is approximately 33% of the water holding capacity of the soil. Oragun (1988) reports maximum RS values for different fuel oils.

Table 1. Residual Saturation (RS) values for different fuels.

	Fuel	RS
•	light oil and gasoline diesel and light fuel oil lube and heavy fuel oil	0.10 0.15 0.20

The volume of soil in cubic yards contaminated by a spill is given by (Dragun, 1988)

$$V_{s} = \frac{0.2 \times V_{gc}}{\rho \times (RS)} \tag{1}$$

where $V_x = Volume$ of contaminated soil at residual saturation (yd^3) . $V_{zc} = volume$ of discharged hydrocarbons in barrels $= \{N \text{ gallons of spilled fuel}\} \times \{1 \text{ barrel per } 44 \text{ gallons}\}$

